

August 15, 2019

VIA ECF

Honorable J. Paul Oetken
United States District Judge
United States Courthouse
40 Foley Square
New York, New York 10007

Re: VR Optics, LLC v. Peloton Interactive, Inc., Civil No. 16-6392 (JPO)

Dear Judge Oetken:

We represent Plaintiff VR Optics, LLC, and Third-Party Defendants Villency Design Group, LLC, Eric Villency, and Joseph Coffey (collectively, "VRO/VDG").

Pursuant to Paragraph 2(E) of Judge Oetken's Individual Practices, VRO/VDG submit this letter motion for leave to file under seal their August 15, 2019 reply in further support of VRO/VDG's Motion for Summary Judgment (Docket #s 207-210). A partially redacted version of VRO/VDG's reply is being submitted contemporaneously.

VRO/VDG seek leave to file under seal out of an abundance of caution because Peloton has designated documents, deposition testimony, and exhibits cited to in VRO/VDG's reply as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" under the Stipulated Protective Order entered by the Court on May 15, 2018 (Docket #82). We understand the Court's prior rulings regarding the importance of public access to federal court filings, and we reserve the right to argue that some or all of the sealed materials should be made available to the public.

Respectfully submitted,

s/ Paul S. Doherty, III

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